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> (256) 638-2144 FAX (256) 638-4830

February 20, 2013

VIA USPS Express Mail

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Suite TW-A325 Washington, D.C. 20554

Re: Farmers Telecommunications Cooperative, Inc. (Filer ID 803427) and Farmers Telecommunications Corporation, Inc. (Filer ID 821126)
Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification for 2012 EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Farmers Telecommunications Cooperative, Inc., and Farmers Telecommunications Corporation, Inc. we submit the original and four (4) copies of the above referenced annual CPNI Compliance Certification for 2012.

Very truly your

Please contact me if you have any questions regarding this matter.

Christopher E. Townson

Manager of Customer Service & Support

Farmers Telecommunications Cooperative, Inc.

Telephone: (256) 638-2144 Facsimile: (256) 638-4830

Email: ctownson@staff.farmerstel.com

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2012 EB Docket No. 06-36

Form 499 Filer ID 803427-Farmers Telecommunications Cooperative, Inc., and Form 499 Filer ID 821126-Farmers Telecommunications Corporation, Inc.

CERTIFICATION

I, <u>Christopher E. Townson</u>, hereby certify that I am an officer of the companies named above, hereinafter collectively referred to as "FTC", and acting as an agent of FTC, that I have personal knowledge that FTC has established operating procedures effective during the calendar year 2012 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission ("Commission").

Attached to this certification is an accompanying statement explaining how FTC's procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

FTC has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

FTC has not received customer complaints in the past year concerning the unauthorized release of CPNI.

FTC represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. FTC also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the companies to enforcement action.

Name: Christopher E. Townson

Title: Assistant Secretary Date: February 20, 2013



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Before the Federal Communications Commission Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF FARMERS TELECOMMUNICATIONS COOPERATIVE, INC. and FARMERS TELECOMMUNICATIONS CORPORATION, INC.

EB Docket No. 06-36

STATEMENT

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Farmers Telecommunications Cooperative, Inc. and Farmers Telecommunications Corporation, Inc. (hereinafter "FTC") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, et seq. on behalf of FTC:

- 1. I have personal knowledge that FTC has implemented a system whereby the status of a customer's CPNI approval can be clearly determined prior to the use of CPNI.
- 2. I have personal knowledge that FTC obtains written approval for the use of its customers' CPNI and that FTC has notified its customers of their right to restrict FTC's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that FTC has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that FTC has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, et seq., and that FTC has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that FTC implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.

- 5. I have personal knowledge that FTC maintains records of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. FTC also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. FTC retains all such records for a minimum period of one year.
- 6. I have personal knowledge that FTC has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, FTC's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- 7. I have personal knowledge that FTC has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of FTC, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject FTC to enforcement action.

Executed on this 20th day of February, 2013.

FARMERS TELECOMMUNICATIONS COOPERATIVE, INC. FARMERS TELECOMMUNICATIONS CORPORATION, INC.

By:

Printed: Christopher E. Townson

As Its: Assistant Secretary